## UNITED STATE BANKRUPTCY COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

In re

Wellington & Pulaski Condominium Association Inc.,

Debtor.

**Chapter 11 Case No. 15 B-035476** 

Judge Carol A. Doyle

**Hearing Date: 12/02/2015** 

Hearing Time: 10:30 a.m.

To: See attached service list

## **NOTICE OF MOTION**

PLEASE TAKE NOTICE that, on December 2, 2015 at the hour of 10:30 a.m., I will appear before the Honorable Judge Carol A Doyle or whomever may be sitting in her place and stead in Courtroom 742, Dirksen Federal Building, 219 South Dearborn, Chicago, Illinois, and present the attached Motion to Dismiss Chapter 11 Involuntary Petition Pursuant to 11 U.S.C §303(b), a copy of which is attached hereto and herewith served upon you, at which time and place you may appear.

CHI4005 LLC and 4003 Wellington2 Inc., Movants

By: /s/ Kenneth A. Henry

Kenneth A. Henry, Esq., Attorney for Movants

Kenneth A. Henry, Esq. (ARDC No. 1193457) Attorney for Movants One North LaSalle Street, Suite 2200 Chicago, Illinois 60602 (312) 857-0100 khenry@kahlaw.com

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that he is causing a copy of this Notice of Motion and the Motion attached hereto to be served upon the following counsel of record by CM-ECF service, this  $20^{th}$  day of November 2015:

Patrick S Layng USTPRegion11.ES.ECF@usdoj.gov

Esther E Tryban Telser on behalf of Creditor City of Chicago, a municipal corporation <a href="mailto:etrybantelser@cityofchicago.org">etrybantelser@cityofchicago.org</a>

And by U.S. Mail on the following:

GEORGE OPARANOZIE, ESQ. Options Law Group, P.C. 123 W. Madison Street, Suite 1400 Chicago, IL 60602 Attorney for Petitioning Creditors

PROVEST DE II Inc. c/o Jeffrey Nelson [registered agent] 310 Busse Rd Park Ridge, III 60068

PROVEST REALTY SERVICES INC c/o Pro Vest De II Inc [registered agent[ 161 N Clark Street #4700 Chicago, Illinois 60601

GEORGE SOMER 310 Busse Rd Park Ridge, IL 60068

WELLINGTON & PULASKI CONDOMINIUM ASSOC. INC c/o Pro Vest De II Inc [registered agent] 161 N Clark Street #4700 Chicago, Illinois 60601

BOARD OF MANAGERS WELLINGTON & PULASKI CONDOMINIUM 2960 N Pulaski Rd Chicago, IL.

/s/Kenneth A. Henry Kenneth A. Henry, Esq. KENNETH A. HENRY, ESQ. (ARDC # 1193457) One North LaSalle Street, Suite 2200 Chicago, Illinois 60602-3912 312.857.0100/312.857.1157 (fax) khenry@kahlaw.com